



Shapiro Arato Bach LLP

500 Fifth Avenue, 40th Floor New York, NY 10110
phone: 212-257-4880 | fax: 212-202-6417
www.shapiroarato.com

Alexandra A.E. Shapiro
ashapiro@shapiroarato.com
Direct: 212-257-4881

February 2, 2023

VIA ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Trevor Milton*, 21-cr-478 (ER)

Dear Judge Ramos,

Defendant Trevor Milton writes to respectfully request permission to file an oversized Reply Memorandum of Law in support of his post-trial motion pursuant to Rules 29 and 33 of the Federal Rules of Criminal Procedure. Mr. Milton requests permission to file a reply brief that is up to 15 pages long. The government takes no position on this request.

The additional pages requested are necessary to fully respond to the numerous factual and legal arguments raised in the government's 28-page long opposition to Mr. Milton's post-trial motion. Mr. Milton's reply brief also addresses the Second Circuit's recent decision in *United States v. Nieves*, ---F.4th---, No. 21-1901, 2023 WL 405354 (2d Cir. Jan. 26, 2023), which was published after Mr. Milton's opening brief was filed.

Respectfully submitted,

/s/ Alexandra A.E. Shapiro

Alexandra A.E. Shapiro

cc: counsel of record (by ECF)